

O'NEILL / HASSEN
MEMORANDUM ENDORSED

Attorneys at Law

October 6, 2020

VIA ECF and Email

Honorable Gregory H. Woods
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 10/6/2020
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RE: *United States v. Lorry Gonzalez*, 20 Cr. 425 (GHW)

Dear Judge Woods:

I represent Lorry Gonzalez in the above-captioned matter. I am writing to request a modification to the conditions of Ms. Gonzalez's bail. The probation department has no objection to the modification, but prior judicial approval is needed.

Ms. Gonzalez resides with her two severely disabled sons in the Bronx, NY. As a condition of her bail, the government had not wanted her to return to her apartment, where the alleged crimes had occurred. As a special condition of her release, Ms. Gonzalez was required to live at her brother's house.

Ms. Gonzalez is the sole parent to two disabled children: her eighteen-year-old brother, of whom she has custody, and her adopted son. Both suffer from autism and require special schooling and services. Ms. Gonzalez's ex-husband has abused her for years and knows where she lives. Prior to her arrest in this case she had intended to move away from the Bronx to be free of him.

Ms. Gonzalez has found a townhouse in Cherry Hill, New Jersey that is appropriate for her and her family. She will live alone with her two children and will have enough room for her children to thrive and for her to have a fresh start.

I ask that the Court order that the bail be modified to: 1) extend the travel restriction to New Jersey, and 2) replace the condition that requires Ms. Gonzalez to live at her brother's residence with a condition to maintain her residence and not to relocate without prior approval of Pretrial Services.

I thank the Court for its attention to this matter.

Kind regards,

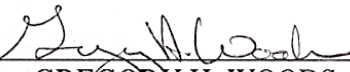
/s/

Grainne E. O'Neill

New apartment in Cherry Hill, NJ

Application granted. The terms of Ms. Gonzalez's release are modified as follows: Ms. Gonzalez may travel to the District of New Jersey. The condition requiring that she live with her brother is replaced with a condition requiring that she maintain her residence and not relocate without the prior approval of Pretrial Services. The remaining terms of Ms. Gonzalez's pre-trial release remain in full force and effect.

SO ORDERED
October 6, 2020



GREGORY H. WOODS
United States District Judge

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